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October 11, 2019

VIA ECF

The Honorable Magistrate Judge Arlene R. Lindsay
United States District Court
Eastern District of New York
Long Island Federal Courthouse
814 Federal Plaza
Central Islip, New York 11722-4451

Re: *Alex Goldman v. Catherine Reddington*, 1:18-cv-03662-RRM-ARL

Dear Magistrate Judge Lindsay:

We represent plaintiff Alex Goldman in the above-referenced action. We submit this joint status report on behalf of the parties pursuant to the Court's Order dated September 30, 2019. As Your Honor is aware, on September 27, 2019, Judge Mauskopf issued a decision denying Defendant Catherine Reddington's motion to dismiss pursuant to Federal Rule of Civil Procedure ("Rule") 12(b)(6), in its entirety, except with respect to the tortious interference claim concerning New Jersey Institute of Technology which had been conceded by Plaintiff.

Prior to the filing of the Rule 12(b)(6) motion, the parties in this action had not participated in a Rule 26(f) conference as discovery was stayed while the motion to dismiss was pending, with the exception of the parties exchanging initial disclosures pursuant to Rule 26(a)(1). In the event the Court would like to schedule a new date for the Rule 26(f) conference, counsel for Plaintiff and Defendant are available for an appearance on October 28, 2019 and November 13, 15, or 22, 2019.

Counsel for the parties conferred via telephone on October 7, 2019 and have agreed to the following proposed pretrial schedule:

January 17, 2020: Deadline for commencement of motion practice for joinder of additional parties or amendment of pleadings.

April 30, 2020:¹ All discovery, inclusive of expert discovery, to be concluded.

¹ Counsel for both parties have conferred and expressed concerns about future scheduling conflicts that may arise as a result of pending trials the attorneys for each party have scheduled in early 2020. In light of these concerns, Plaintiff's and Defendant's counsel have agreed that they would be amenable, if necessary, to a brief extension of the April 30, 2020 discovery deadline, should the Court so permit.

May 15, 2020: Any party planning on making a dispositive motion must take the first step in the motion process by this date or risk forfeiting the right to make such a motion. The moving party will consult the district judge's individual rules regarding such motion practice.

The parties leave it to the Court's discretion to determine the date of the final conference. The parties are aware that the Court requires meaningful settlement discussions at the final conference and that clients or other persons with full settlement authority must be available by telephone. The parties will also electronically file a joint proposed pretrial order in compliance with the district judge's individual rules, signed by counsel for each party, prior to the final conference.

We thank the Court for its consideration of this proposed pretrial schedule. We are available at the Court's convenience to appear and address any questions or concerns Your Honor may have.

Respectfully submitted,

ChaudhryLaw PLLC

By: /s/ Seth J. Zuckerman
Seth J. Zuckerman

Cc: Sandra Musumeci, Esq. (via ECF)